

EXHIBIT 2

William W. O'Connor

From: Jacob Rowe <jrowe@fulmersill.com>
Sent: Thursday, March 17, 2022 9:35 AM
To: William W. O'Connor; Margo E. Shipley
Cc: Shelley Hicks; Simone Fulmer; Madison Botizan
Subject: [EXTERNAL]:Beeson v. Safeco

Bill -

Thanks for talking to me yesterday.

As we discussed, Safeco adjuster Alex Keffer called our office on Monday and Tuesday and offered to tender the remaining \$75,000.00 of Ms. Beeson's underinsured motorist benefits. Based on the adjuster's statement, Safeco has reevaluated the claim and wishes to make payment immediately.

Given the matter is in litigation, I felt more comfortable calling you to accept this tender.

My understanding is that there are no outstanding medical liens, but we are in the process of confirming this.

Please have Safeco issue payment to Fulmer Group, PLLC and Quinda Beeson in the amount of \$75,000.

Additionally, last year, Ms. Meyer testified that she was continuing to handle Ms. Beeson's UM claim and that there had been no non-litigation related actions taken since the filing of suit. Given this week's developments, it appears that Safeco has assigned a new adjuster and, pursuant to its continuing obligation to handle Ms. Beeson's claim in good faith, has re-evaluated the benefits Ms. Beeson is entitled to receive under the same. Although discovery in this matter is closed, we believe that Safeco must update its discovery production with any and all post-litigation claim file materials related to Safeco's re-evaluation and determination that Ms. Beeson is entitled to the full policy limit of her UM policy. Obviously, we would also like to depose Mr. Keffer and / or any other Safeco employees responsible for making this new claim decision. Finally, we believe these evidentiary materials bear on the motions for summary judgment and motions in limine currently pending before the Court and would ask that Safeco agree to a joint pleading requesting the Court hold any ruling in abeyance until the necessary additional evidentiary materials can be gathered and the briefing on those matters supplemented given Safeco's new claims position.

Please advise if you are agreeable.

Jacob L. Rowe

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